

## **NPDES Phase II Permit Minimum Control Measures (MCM)**

### **1. Public Education and Outreach**

Education is intended to create an understanding of the impacts of stormwater and the factors that contribute to these impacts. A good education and outreach program will create greater participation in beneficial activities and, hopefully, greater support for funding and projects.

### **2. Public Participation/Involvement**

Involvement is critical in all public decision making. Thus the EPA has made public participation a required part of the Phase II Permit. The thought is that by creating an inclusive environment the activities required by the Permit would have wider support, quicker implementation, and have connections to other local, state and federal resources to buttress municipal officials.

### **3. Illicit Discharge Detection and Elimination (IDDE)**

IDDE is the removal of non-stormwater flows from the MS4. The introduction of non-stormwater flows have 2 primary impacts, the first is taxing the capacity of MS4 and potentially impacting property owners through flooding events from overflow. The second is the introduction of contaminants (including nutrients) to the MS4. These contaminants become the responsibility of the municipality once they are in the MS4 and any damage or impacts they cause are the responsibility of the Town.

### **4. Construction Site Runoff Control**

The control of construction site runoff, like IDDE, prevents the introduction of contaminants into the MS4. In the case of construction site runoff most likely sediment is the contaminant that will be introduced. However, sediment can be particularly impactful as it can carry chemicals, nutrients, and other particulates into the MS4. As was mentioned earlier once something is introduced to the MS4 the Town becomes responsible for any impacts. With sediment, there are the theoretical impacts but also the requirement to remove it from catch basins and the associated cost for that and for the disposal of the sediment.

## 5. Post-Construction Runoff Control

Post-construction control is the requirement that upon the development of sites that the stormwater is captured treated and retained on-site. This allows the MS4 to handle the runoff from the street and other areas it is designed to manage. Post-construction systems are similar to MS4's but are privately owned and in many cases (disturbance over 40,000 sq. ft.) they are part of an EPA Construction General Permit.

## 6. Pollution Prevention/Good House Keeping

This MCM is based around the Town maintaining the MS4. This includes items like catch basin cleaning, outlet monitoring, pipe and other repairs. The long and short of this is to work to keep the system functioning efficiently and self-assess on a regular basis to ensure that the procedures and practices in place do so.